

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

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COUNTER TERRORIST GROUP US,
COUNTERR GROUP, and J. K. IDEMA,

Plaintiffs,

- against -

AUSTRALIAN BROADCASTING CORP.;
a/k/a ABC AUSTRALIA; ABC
CORPORATIONS 1-100; LIZ JACKSON;
ERIC CAMPBELL; JOSEPH A CAFASSO;
EDWARD A. ARTIS; KNIGHTSBRIDGE
INTERNATIONAL, INC.; KNIGHTSBRIDGE
INTERNATIONAL HUMANITARIAN
RELIEF AND HUMAN IMPROVEMENT
PROGRAMS, INC.; ROBERT C. MORRIS;
PARTNERS INTERNATIONAL
FOUNDATION; WILLIAM JOHN HAGLER,
Both Individually and Severally, and DOES 1
through 7, inclusive,

Defendants.
----- X

08 Civ 2356 (DAB)

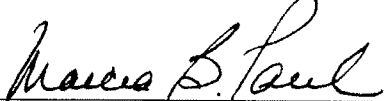
**NOTICE OF MOTION TO
DISMISS FOR LACK OF SUBJECT
MATTER JURISDICTION OR
ON GROUNDS OF *FORUM NON
CONVENIENS***

PLEASE TAKE NOTICE that, upon the annexed declaration of Robert Simpson, Esq., dated May 21, 2008; the declaration of Eric Campbell, dated May 20, 2008; the declaration of Liz Jackson, dated May 20, 2008; the expert declaration of John Sheahan, dated May 21, 2008; the affidavit of Edward J. Davis, Esq., dated May 20, 2008, and the exhibits annexed thereto, the accompanying memorandum of law; and all other pleadings and proceedings, defendants the Australian Broadcasting Corporation and Liz Jackson will move before this Court, Hon. Deborah A. Batts, United States District Judge, Southern District of New York, in Courtroom 24B of the United States Courthouse, 500 Pearl Street, New York, New York on the 5th day of August, 2008 or such other time and place as the Court may direct, for an order dismissing the complaint herein without prejudice for lack of subject matter jurisdiction pursuant to Fed. R. Civ. P. 12(b)(1) or, in the alternative, on the grounds of *forum non conveniens*.

PLEASE TAKE FURTHER NOTICE THAT, pursuant to an agreement between the parties, Plaintiffs' papers in opposition to Defendants' motion shall be due on July 21, 2008, and Defendants' reply papers in further support of its motion shall be due on August 4, 2008.

Dated: New York, New York
May 21, 2008

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